

REMARKS

In the Office Action, the Examiner objected to claim 39 for an informality. The Applicant has amended this claim to correct the informality, thereby tending to the Examiner's objection. Additionally, the Examiner rejected claims 18 - 20, 37 - 39, 41 - 44, and 46 under 35 USC § 102(e) as being anticipated by Zubeldia (US Patent 6,397,224). The Examiner also rejected claim 40 under 35 USC § 103(a) as being unpatentable over Zubeldia in view of Gasch ("0.2.7.5. One-way hashing", 7/9/1999 pages 1 - 8, as obtained from <http://www.fearme.com>). The Examiner also rejected claims 26 and 28 - 36 under 35 USC § 103(a) as being unpatentable over Zubeldia view of Halamka ("Managing Care in an integrated delivery system via an Intranet", 1998 pages 1 - 5, as obtained from <http://www.amia.org>). The Applicant has amended claims 18, 26, 30, 37, and 41 for editorial clarity. The Applicant respectfully submits the following arguments in support of patentability.

Claim 18

The Examiner rejected claim 18 as being anticipated by Zubeldia. In claim 18, the Applicant recites a method for linkage of de-identified records that includes obtaining client de-identified records, the client de-identified records comprising field-level encrypted match codes. The field-level encrypted match codes include at least one identification data field that is encoded prior to one-way encryption. The method also includes providing a database of master de-identified records, the master de-identified records comprising field-level encrypted match codes, comparing the match codes of the client de-identified records and the master de-identified records, and linking at least a portion of the client de-identified records with the master de-identified records using comparison of the match codes.

Zubeldia does not teach an identification data field that is encoded prior to one-way encryption. Rather, Zubeldia teaches only first and second one-way encryption. Such was discussed in a telephone conversation with the Examiner on Friday, February 24, 2006 in which the Examiner initially agreed that Zubeldia does not appear to teach encoding any type of personal identification data field prior to encryption. Since Zubeldia does not teach that which the Applicant claims, claim 18 is allowable in view of Zubeldia. The Applicant, therefore, respectfully requests reconsideration and allowance of claim 18.

Claims 19 and 20 depend from claim 18 and inherit all of the novel features of the independent claim. For at least these reasons, claims 19 and 20 are also novel. The Applicant, therefore, respectfully requests reconsideration and allowance of claims 19 and 20.

Claims 26 - 29

The Examiner rejected claim 26 as being unpatentable over Zubeldia in view of Halmaka. In claim 26, the Applicant recites a system that links de-identified records. The system includes, among other things, a server computer that is adapted to compare first field-level encrypted match codes and second field-level encrypted match codes and link at least a portion of client de-identified records with the master de-identified records based on a comparison of the first field-level encrypted match codes and the second field-level encrypted match codes. The at least one field-level encrypted match code includes at least one identification data field that is encoded prior to one-way encryption.

Again, Zubeldia does not teach an identification data field that is encoded prior to one-way encryption. Rather, Zubeldia teaches only first and second one-way encryption. Neither does Halmaka teach an identification data field that is encoded prior to one-way encryption. Since neither Zubeldia nor Halmaka teach, either alone or in combination, all elements of the Applicant's claims, claim 18 is allowable in view of Zubeldia and Halmaka. The Applicant, therefore, respectfully requests reconsideration and allowance of claim 26.

Claims 27 - 29 depend from claim 26 and inherit all of the novel features of the independent claim. For at least these reasons, claims 27 - 29 are also novel. The Applicant, therefore, respectfully requests reconsideration and allowance of claims 27 - 29.

Claims 30 - 36

The Examiner rejected claim 30 as being unpatentable over Zubeldia in view of Halmaka. In claim 30, the Applicant recites a system that links de-identified records. The system includes, among other things, a server that is communicatively coupled to a database to link at least a portion of client de-identified records with master de-identified records based on a comparison of match codes. The match codes include at least one identification data field that is encoded prior to one-way encryption.

Again, Zubeldia does not teach an identification data field that is encoded prior to one-way encryption. Rather, Zubeldia teaches only first and second one-way encryption. Neither does Halamka teach an identification data field that is encoded prior to one-way encryption. Since neither Zubeldia nor Halamka teach, either alone or in combination, all elements of the Applicant's claims, claim 30 is allowable over of Zubeldia and Halamka. The Applicant, therefore, respectfully requests reconsideration and allowance of claim 30.

Claims 31 - 36 depend from claim 30 and inherit all of the novel features of the independent claim. For at least these reasons, claims 31 - 36 are also novel. The Applicant, therefore, respectfully requests reconsideration and allowance of claims 31 - 36.

Claims 37 - 40

The Examiner rejected claim 37 as being anticipated by Zubeldia. In claim 37, the Applicant recites a system that links de-identified records. The system includes, among other things, means for obtaining client de-identified records, the client de-identified records comprising field-level encrypted match codes. The field-level encrypted match codes include at least one identification data field that is encoded prior to one-way encryption.

Again, Zubeldia does not teach an identification data field that is encoded prior to one-way encryption. Rather, Zubeldia teaches only first and second one-way encryption. Since Zubeldia does not teach that which the Applicant claims, claim 37 is allowable in view of Zubeldia. The Applicant, therefore, respectfully requests reconsideration and allowance of claim 37.

Claims 38 - 40 depend from claim 37 and inherit all of the novel features of the independent claim. For these reasons, claims 38 - 40 are also novel. However, these claims require additional features that further distinguish from the cited references. For example, in claim 40, the Applicant recites the client de-identified records having a personal identification data field that is encoded with a seed value to provide seed value identifiers.

The Examiner rejected claim 40 as being unpatentable over Zubeldia in view of Gasch, stating that Zubeldia does not disclose encoding records with the seed value but that Gasch does. The Applicant respectfully disagrees because, among other reasons, Gasch teaches using a seed value in a hash function to generate a hash value. That hash value is concatenated with a block

of data that is input into the hash function again. This process continues, presumably, until there is no more data to push through the hash function. This differs from the Applicant's claim because, among other reasons, Gasch does not teach concatenating a seed value to a personal identification data field (e.g. a block of data) prior to pushing the concatenated personal identification data field through a hash function. As such, neither Gasch nor Zubeldia teach or reasonably suggest, either alone or in combination, all elements of the Applicant's claims. This was discussed in a telephone conversation with the Examiner on Friday, February 24, 2006.

For at least these reasons, the Applicant believes claims 38 - 40 are allowable and respectfully requests such disposition.

Claims 41 - 46

The Examiner rejected claim 41 as being anticipated by Zubeldia. In claim 41, the Applicant recites a method for linkage of de-identified records. The method includes, among other things, receiving client de-identified records and comparing match codes of the client de-identified records with match codes of master de-identified records. The field-level encrypted match codes include at least one identification data field that is encoded prior to one-way encryption.

Again, Zubeldia does not teach an identification data field that is encoded prior to one-way encryption. Rather, Zubeldia teaches only first and second one-way encryption. Since Zubeldia does not teach that which the Applicant claims, claim 41 is allowable in view of Zubeldia. The Applicant, therefore, respectfully requests reconsideration and allowance of claim 41.

Claims 42 - 46 depend from claim 41 and inherit all of the novel and nonobvious features of the independent claim. For at least these reasons, claims 42 - 46 are also novel and nonobvious. The Applicant, therefore, respectfully request reconsideration and allowance of claims 42 - 46.

CONCLUSION

In view of the above, the Applicant believes that all claims are in condition for allowance and respectfully requests such disposition. In the event that a telephone conversation would further prosecution and/or expedite allowance, the Examiner is invited to contact the undersigned.

Respectfully submitted,

MARSH FISCHMANN & BREYFOGLE LLP

By: 

Gregory T. Fettig
Registration No. 50,843
3151 South Vaughn Way, Suite 411
Aurora, Colorado 80014
(720) 562-5509

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